REMARKS

Interview Summary

Applicants would like to thank Examiner Patel for the courtesy of extending a telephonic interview on October 11, 2006. During the interview, claims 80 and 82-84 were discussed in view of U.S. Patent No. 6,526,575 to McCoy et al. ("McCoy"). Applicants' representative requested clarifications about the current rejections and argued that McCoy fails to disclose certain limitations recited in those claims. Arguments similar to those that were discussed during the interview are presented below with reference to specific claims.

No agreement has been reached regarding the patentability of the claims.

Claims

Claims 80-125 were pending when last examined. Claims 24-27 are canceled and claims 1-23 are withdrawn. With this Response, Applicants have amended claims 84, 99, and 114. No new matter has been added. Support for the amendment can be found at least in pages 4 and 5 of the present application.

Claim Rejections – 35 USC § 102

Claims 80-125 were rejected under 35 U.S.C. 102(e) as being anticipated by McCoy. Applicants respectfully traverse the rejections.

Claim 80 recites a computer-implemented method for processing description of multimedia content. The method includes receiving a description about a group of multimedia objects, the group including a first multimedia object, and the description about the group including a first group identifier that identifies the group. The first group identifier is compared with one or more previously stored group identifiers when the first multimedia object is displayed on a terminal, and if the first group identifier is different from the previously stored group identifiers, the description about the group of multimedia objects is stored.

McCoy discloses techniques for providing multimedia and control information from a central "uplink" facility 102 via satellite to "downlink" facilities 106 that use the received data to schedule their own (cable) broadcast to television viewers. Col. 1:7-17 and col. 4:8-32. The control information can include television program schedules identifying program titles and telecast times. Col. 4:33-47. At the central uplink facility 102, a program scheduling process 226 uses a title maintenance 246 to process "data for entering and updating titles of the multimedia contents to be used," and to match the titles against internal references "to avoid confusion where different vendors or network sources use different titles for the same media contents." *See* FIG. 6, col. 8:49-59, and col. 9:1-7.

The Examiner asserted that McCoy's program schedule corresponds to the claimed first group identifier and McCoy's program scheduling process 226 includes the claimed comparing step. *See* Office Action of July 13, 2006, at pages 2 and 3. The applicants respectfully disagree.

First, McCoy fails to disclose the claimed first group identifier. The claim explicitly requires that the description about the group includes a first group identifier that identifies the group of multimedia objects, where the group includes a first multimedia object. The Examiner seems to argue that McCoy's program schedule as a whole corresponds to the claimed group identifier. The applicants respectfully submit that a skilled artisan, in view of the present specification, understands that the claimed first group identifier is a distinct part that is distinguished from all other parts within the description about the group. *See, e.g.,* FIG. 2. Furthermore, dependent claim 93 explicitly distinguishes the first group identifier from a title for the group within the description about the group. Other claims further distinguish the first group identifier from a first object identifier of the first multimedia object (*see, e.g.,* claim 81) and from a title for the first multimedia object (*see, e.g.,* claim 90). Thus, a reasonable interpretation of the claim should also distinguish the first group identifier from McCoy's whole program schedule, which includes program titles, telecast times and other program descriptions, but lacks the claimed group identifier. ("During patent examination, the pending claims must be 'given the broadest reasonable interpretation consistent with the specification.' ... The broadest reasonable interpretation of the claims

must also be consistent with the interpretation that those skilled in the art would reach." *See* MPEP 2111.)

Second, even if we assume, for the sake of argument, that McCoy's schedule identifies a group of multimedia objects as asserted by the Examiner, McCoy still fails to disclose comparing the first group identifier with one or more previously stored group identifiers, as required by the claim. Indeed, McCoy fails to disclose that the program scheduling process 226 includes comparing a first group identifier with one or more previously stored group identifiers. At best, McCoy discloses that a program title, which can also be a portion of the schedule, is compared with internal references. Col. 9:1-7. The claim, however, explicitly requires a comparison using the first group identifier which identifies the group. In contrast, McCoy's program title, by itself, identifies only a single program, but cannot identify the schedule of which the title is only a part. Indeed, the same program title may appear in different schedules, for example, those received from different networks. *Id.* McCoy also fails to disclose that a particular schedule as a whole, or any information that would identify the whole schedule, is compared to previously stored schedules or schedule identifiers. Thus, McCoy fails to disclose comparing a first group identifier with one or more previously stored group identifiers, as required by the claim.

Third, McCoy also fails to disclose that the program scheduling process 226, which the Examiner assumes to include the claimed comparing step, is performed "when the first multimedia object is displayed on a terminal," as required by the claim. No such timing relation is disclosed by McCoy either explicitly or implicitly. Instead, McCoy's program scheduling process 226 is performed at the uplink facility 102 independent of whether or when a scheduled program is displayed on a terminal. *See* FIG. 6 and Col. 8:49-59. Indeed, McCoy discloses that the uplink facility 102 transmits the program schedules to downlink facilities 106 that further process the received schedules to generate their own program schedules, based on which the downlink facilities 106 will broadcast their own scheduled programs at a later time. Col. 4:33 to col. 5:11. Thus, McCoy discloses an uncontrolled substantial delay between performing the program scheduling process 226 at the uplink facility 102 and the actual broadcast of any scheduled program. Furthermore, even if a

particular program is scheduled at the central uplink facility 102, the downlink facilities 106 may decide to filter out the particular program from the broadcast. *See, e.g.*, FIG. 26. And even if the particular program is not filtered out, no viewer may watch the broadcast. Thus, McCoy fails to disclose any causal relation which would ensure that the program scheduling process 226 is necessarily and invariably occurs at the time when a program in the processed schedule is displayed on a terminal. Accordingly, McCoy fails to disclose comparing the first group identifier with one or more previously stored group identifiers when the first multimedia object is displayed on a terminal, as recited by the claim.

Because McCoy fails to disclose at least the above limitations, claim 80 is allowable.

Independent claims 96 and 111 recite a computer program product and a system, respectively, that require a first group identifier that identifies a group of multimedia objects. The claims also require comparing the first group identifier with one or more previously stored group identifiers when the first multimedia object is displayed on a terminal. As discussed above with reference to claim 80, McCoy fails to disclose these limitations. Thus, claims 96 and 111 are allowable.

Claims 81-95, 97-110 and 112-125 are dependent claims, and are allowable for at least the same reasons as their respective base claims.

The dependent claims may also provide additional reasons for patentability. Claims 82, 98 and 113, for example, require providing link information in the usage history, wherein the link information is configured to link the description about the group to each user action that is related to the first multimedia object and listed in the usage history. Although McCoy discloses process information 208 that is used internally in the uplink facility 102 for tracking when particular contents were sent out, McCoy fails to disclose any link information that is configured to link the description about the group to each user action that is related to the first multimedia object and listed in the usage history, as required by claims 82, 98 and 113. Lacking the claimed link information, McCoy cannot disclose that the link information includes the first group identifier, as required by claim 83. Neither does McCoy disclose the

step of storing the usage history with the link information, but without storing the description about the group of multimedia objects if the first group identifier is the same as one of the previously stored identifiers, as required by amended claims 84, 99 and 114.

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CONCLUSION

Applicants respectfully request that the pending claims be allowed and the case passed to issue. Should the Examiner wish to discuss the Application, it is requested that the Examiner contact the undersigned at (415) 772-7493.

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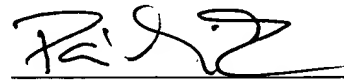
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November 13, 2006

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